



ENTERED
09/15/2020

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, <i>et al.</i>,	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	(Jointly Administered)
	§	
	§	

**STIPULATION AND ORDER GRANTING LIMITED
RELIEF FROM THE AUTOMATIC STAY ON REGIS SOUTHERN
PERSONAL INJURY LITIGATION**

This stipulation and order (the “**Stipulation**”) is entered into by and among the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) and Regis Southern (the “**Movant**”) an individual with pending personal injury litigation against certain of the Debtors (together, the Debtors and Movant are collectively referred to as the “**Parties**,” and, each, as a “**Party**”). The Parties hereby stipulate and agree as follows:

RECITALS

A. WHEREAS, on August 20, 2020 (the “**Petition Date**”), the Debtors commenced the above-captioned voluntary cases under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

B. WHEREAS, on August 26, 2020, Regis Southern filed the *Motion of Regis Southern for Relief from the Automatic Stay to Permit Continuation of Personal Injury Litigation Pending in the U.S. District Court of the Western District of Louisiana* [Dkt. No. 253].

C. WHEREAS, the Parties have agreed, subject to the approval of the Bankruptcy Court, to modify the automatic stay pursuant to section 362 of the Bankruptcy Code for the limited purpose and subject to the terms and conditions set forth below.

It is hereby **ORDERED** that the automatic stay pursuant to section 362 of the Bankruptcy Code is modified as follows:

1. This Stipulation shall have no force or effect unless and until approved by the Bankruptcy Court (the “**Entered Date**”).

2. Upon the Entered Date, the automatic stay shall be modified solely to the extent necessary to permit Regis Southern to prosecute the claims set forth in the complaint, filed February 25, 2019, in the case styled *Regis Southern v. Eaton Oil Tools, Inc. et al*, No. 6:19-cv-00229 (W. D. La.) (the “**Lawsuit**”). All Parties may prosecute and defend any appeal from a final judgment issued in the Lawsuit.

3. The Debtors and their estates and the reorganized debtors and their estates shall not be obligated to pay any amounts owed or awarded in connection with the Lawsuit, including but not limited to, any monetary damages, insurance deductible, or attorneys’ fees and expenses, and the Movant shall credit the Debtors or reorganized debtors, as applicable, from any resulting settlement or judgment the amount necessary to satisfy and fully pay any required self-insured retention under the applicable insurance policy (and as a result, the Debtors shall be deemed to have fully satisfied such self-insured retention).

4. For the avoidance of doubt, the Movant may collect upon such settlement or final judgment (i) from anyone providing indemnity for the claim; (ii) from any and all insurance carriers providing coverage for the Movant's claims; and/or (iii) by funds available under any and all insurance policies providing coverage for the Debtors' adjudicated liability. The Movant's collection pursuant to a final judgment is recoverable only from the applicable insurance policies of the Debtors and other third parties and not from the Debtors or their estates directly or indirectly.

5. Nothing contained herein shall be construed as a waiver by the Debtors of their right to object to any and all proofs of claim relating to the Lawsuit or any other pending prepetition action to which one or more of the Debtors are a party that may be filed by Movant or any other party in the Debtors' chapter 11 cases.

6. The limited relief set forth herein shall not be construed as an admission of liability by the Debtors regarding any claim or cause of action arising from or in relation to the Lawsuit or any other matter.

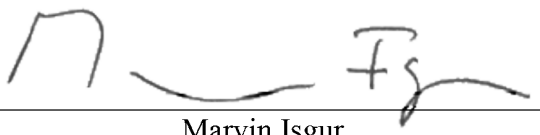
7. This Stipulation shall constitute the entire agreement and understanding of the Parties relating to the subject matter hereof and supersedes all prior agreements and understandings relating to the subject matter hereof.

8. The undersigned who executes this Stipulation by or on behalf of each respective Party represents and warrants that he or she has been duly authorized and empowered to execute and deliver this Stipulation on behalf of such Party.

9. This Stipulation shall not be modified, altered, amended or vacated without the written consent of all Parties hereto or by further order of the Bankruptcy Court.

10. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies arising from this Stipulation.

Signed: September 15, 2020


Marvin Isgur
United States Bankruptcy Judge

United States Bankruptcy Court
Southern District of TexasIn re:
Fieldwood Energy LLC
Dynamic Offshore Resources NS, LLC
DebtorsCase No. 20-33948-mi
Chapter 11**CERTIFICATE OF NOTICE**

District/off: 0541-4

User: TylerLaws
Form ID: pdf002Page 1 of 3
Total Noticed: 67

Date Rcvd: Sep 15, 2020

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 17, 2020.

db +Bandon Oil and Gas GP, LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +Bandon Oil and Gas, LP, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +Dynamic Offshore Resources NS, LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +FW GOM Pipeline, Inc., 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +Fieldwood Energy Inc., 2000 W Sam Houston Pkwy S, s, Houston, TX 77042-3623

db +Fieldwood Energy LLC, 2000 W. Sam Houston Pkwy. S., Suite 1200, Houston, TX 77042-3623

db +Fieldwood Energy Offshore LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +Fieldwood Energy SP LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +Fieldwood Offshore LLC, 2000 W. Sam Houston Pkwy. S., Suite 1200, Houston, TX 77042-3623

db +Fieldwood Onshore LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +Fieldwood SD Offshore LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +GOM Shelf LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +Galveston Bay Pipeline LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

db +Galveston Bay Processing LLC, 2000 W Sam Houston Pkwy S, Suite 1200, Houston, TX 77042-3623

aty +Clark Hill Strasburger, Attn: Duane J. Brescia, 720 Brazos, Suite 700, Austin, TX 78701-2531

aty +Donna T Parkinson, Parkinson Phinney, 3600 American River Dr, Suite 145, Sacramento, CA 95864-5960

aty +Emile Joseph, Jr., Allen & Gooch, P O Box 81129, Lafayette, LA 70598-1129

aty +Petro Amigos Supply, Inc., c/o Wayne Kitchens, Total Plaza, 1201 Louisiana, 28th Floor, Houston, TX 77002-5607

aty +Ronald Savoie, Jackson & Jackson, P.L.L.C., 111 Founders Drive, Suite 400, Baton Rouge, LA 70810-8959

cr +A2D TECHNOLOGIES, INC. D/B/A TGS GEOLOGICAL PRODUC, c/o Andrew A Braun, Gieger Laborde & Laperouse, LLC, Suite 4800, 701 Poydras Street, New Orleans, LA 70139, US 70139-7756

cr +Aker Solutions Inc., Bruce J. Ruzinsky, 1401 McKinney Street, Suite 1900, Houston, TX 77010-4037

intp +Apache Corporation, Hunton Andrews Kurth LLP, Attn: Robin Russell, 600 Travis Street, Suite 4200, Houston, TX 77002-2929

cr +Archrock Services, LP, 16666 North Chase Dr., Houston, TX 77060-6014

cr +Aspen American Insurance Company, c/o Randall A. Rios, Husch Blackwell LLP, 600 Travis Street, Suite 2350, Houston, TX 77002-2629

cr +Bedrock Petroleum Consultants, LLC, c/o Bradley, Attn: James B. Bailey, 1819 Fifth Avenue North, Birmingham, AL 35203-2120

cr +Broussard Brothers, Inc., 501 S. Main St., Abbeville, LA 70510, US 70510-6508

cr +C-Dive, L.L.C., c/o Leann O. Moses, 1100 Poydras Street, Suite 3100, New Orleans, LA 70163-1102

cr +CETCO Energy Services Company, LLC, c/o The Derbes Law Firm, LLC, 3027 Ridgeland Dr., Metairie, LA 70002-4924

cr +DLS, LLC, P.O. Box 309, Lydia, LA 70569-0309

cr +Discovery Gas Transmission LLC, c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705

cr +Diversified Well Logging, LLC, C/O Dore Rothberg McKay, PC, 17171 Park Row, Suite 160, Houston, TX 77084-4927

cr +Everest Reinsurance Company, c/o Randall A. Rios, Husch Blackwell LLP, 600 Travis Street, Suite 2350, Houston, TX 77002-2629

cr +Gibson Applied Technology & Enginnering, 1630 Park Ten Place, Suite 206, Houston, TX 77084

cr +Gulfstar One LLC, c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705

intp +Helis Oil & Gas Company, LLC, c/o J. David Forsyth, 400 Poydras Street, Suite 2550, New Orleans, LA 70130-3292

cr +JX Nippon Oil Exploration (U.S.A.) Limited, c/o GIEGER, LABORDE & LAPEROUSE, L.L.C., 5151 SAN FELIPE, SUITE 750, Houston, TX 77056-3646

cr +Lexon Insurance Company and Endurance American Ins, Harris Beach PLLC, c/o Lee E. Woodard, Esq., 333 West Washing St., Ste. 200, Syracuse, NY 13202-5202

cr +Martin Energy Services LLC, c/o Robert P. Franke, Clark Hill Strasburger, 901 Main St., Suite 6000, Dallas, TX 75202-3748

cr +Milorad Raicevic, 3701 Kirby Drive, Suite 1000, Houston, TX 77098-3928

op +Prime Clerk LLC, One Grand Central Place, 60 East 42nd Street, Suite 1440, New York, NY 10165-1446

intp Railroad Commission of Texas, c/o Office of the Attorney General, Bankruptcy & Collections Division, P. O. Box 12548, Austin, TX 78711-2548

cr +Red Willow Offshore, LLC, c/o Barnet B. Skelton, Jr., 815 Walker, Suite 1502, Houston, TX 77002-5832

cr +Regis Southern, c/o Reese Baker, 950 Echo Lane Ste 300, Houston, TX 77024-2824

cr +SBM Gulf Production LLC, c/o Ken Green, Snow Spence Green LLP, P O Box 549, Hockley, TX 77447-0549

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cr +Seitel Data, Ltd., c/o Duane J. Brescia, Clark Hill Strasburger, 720 Brazos, Suite 700,
Austin, TX 78701-2531

cr +Sheldon Independent School District, c/o Owen M. Sonk, PBFCM, LLP,
1235 N. Loop W., Suite 600, Houston, TX 77008-1772

cr +Sheldon Independent School District, et al, c/o Owen M. Sonk, PBFCM, LLP,
1235 N. Loop W., Ste 600, Houston, TX 77008-1772

intp +TC Oil Louisiana, LLC, c/o Wick Phillips Attn: Jason Rudd, 3131 McKinney Ave., Suite 100,
Dallas, TX 75204-2430

cr +TGS AP Investments AS, c/o Andrew A Braun, Geiger Laborde & Laperouse, LLC,
Suite 4800, 701 Poydras Street, New Orleans, LA 70139-7756

cr +TGS-NOPEC Geophysical Company, c/o Andrew A Braun, Geiger, Laborde & Laperouse, LLC,
Suite 4800, 701 Poydras St., New Orleans, LA 70139, US 70139-7756

cr +TGS-NOPEC Geophysical Company ASA, c/o Andrew A Braun, Geiger Laborde & Laperouse, LLC,
Suite 4800, 701 Poydras Street, New Orleans, LA 70139, US 70139-7756

intp +Tana Exploration Company, LLC, c/o Wick Phillips Attn: Jason Rudd,
3131 McKinney Ave., Suite 100, Dallas, TX 75204-2430

cr +Tetra Applied Technologies, Inc., c/o Zachary S. McKay, Dore Rothberg McKay, P.C.,
17171 Park Row, Suite 160, Houston, TX 77084-4927

cr +Transcontinental Gas Pipe Line Company, LLC, c/o Steven W. Soule, Hall, Estill, et al.,
320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705

cr +U.S. Specialty Insurance Company, c/o Locke Lord LLP, ATTN: Philip Eisenberg,
600 Travis Street, Suite 2800, Houston, TX 77002-2914

cr +WFS Liquids LLC, c/o Steven W. Soule, Hall, Estill, et al., 320 South Boston Avenue,
Suite 200, Tulsa, OK 74103-3705

cr +Westerngeco LLC, c/o Andrew A Braun, Geiger Laborde & Laperouse, LLC,
Suite 4800, 701 Poydras Street, New Orleans, LA 70139, US 70139-7756

cr +Williams Field Services-Gulf Coast Company LLC, c/o Steven W. Soule, Hall, Estill, et al.,
320 South Boston Avenue, Suite 200, Tulsa, OK 74103-3705

cr +Zurich American Insurance Company, c/o Duane Brescia, 720 Brazos Street, Suite 700,
Austin, TX 78701-2531

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

cr +E-mail/Text: bnkatty@aldineisd.org Sep 15 2020 23:37:59 Aldine ISD, Legal Department,
2520 WWThorne Dr., Houston, TX 77073-3406

cr E-mail/Text: houston_bankruptcy@LGBS.com Sep 15 2020 23:36:53 Cypress-Fairbanks ISD,
Linebarger Goggan Blair & Sampson LLP, C/O John P. Dillman, P.O. Box 3064,
Houston, Tx 77253-3064

cr E-mail/Text: houston_bankruptcy@LGBS.com Sep 15 2020 23:36:53 Galveston County,
Linebarger Goggan Blair & Sampson LLP, C/O John P. Dillman, P.O. Box 3064,
Houston, TX 77253-3064

cr E-mail/Text: houston_bankruptcy@LGBS.com Sep 15 2020 23:36:53 Harris County,
Linebarger Goggan Blair & Sampson LLP, C/O John P. Dillman, PO Box 3064,
Houston, TX 77253-3064

cr +E-mail/Text: bankruptcy@islandoperating.com Sep 15 2020 23:37:42
Island Operating Company Inc, 770 S Post Oak Lane, Suite 400, Houston, TX 77056-6666

cr E-mail/Text: houston_bankruptcy@LGBS.com Sep 15 2020 23:36:53 Jefferson County,
Linebarger Goggan Blair & Sampson LLP, c/o John P. Dillman, P.O. Box 3064,
Houston, TX 77253-3064

cr E-mail/Text: houston_bankruptcy@LGBS.com Sep 15 2020 23:36:53 Matagorda County,
Linebarger Goggan Blair & Sampson LLP, c/o John P. Dillman, Post Office Box 3064,
Houston, TX 77253-3064

cr +E-mail/Text: pwp@pattiprewittlaw.com Sep 15 2020 23:36:36 Plains Gas Solutions,
c/o Law Ofc Patricia Williams Prewitt, 10953 Vista Lake Ct., Navasota, TX 77868,
UNITED STATES 77868-6981

TOTAL: 8

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

cr A-Port LLC

cr Acadian Contractors, Inc

cr Ad Hoc Group of Secured Lenders

cr Archrock Partners Operating, LLC and Archrock Serv

cr CCG Services (U.S.) Inc.

cr CNOOC Petroleum Offshore U.S.A. Inc.

cr CTD Legacy LLC

intp Cantor Fitzgerald Securities, as DIP Agent

cr Chevron U.S.A. Inc.

cr Diverse Safety & Scaffolding, LLC

cr Ecopetrol America LLC

intp Eni Petroleum US LLC

intp Eni US Operating Co. Inc.

cr ExxonMobil Corporation

intp Facilities Consulting Group, LLC

cr Florida Gas Transmission Company, LLC

cr Goldman Sachs Bank USA

cr Halliburton Energy Services, Inc.

cr Intracoastal Liquid Mud, Inc., UNITED STATES

intp Kilgore Marine

cr Lavaca County

cr Liberty Mutual Insurance Company

cr Linear Controls, Inc.

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***** BYPASSED RECIPIENTS (continued) *****

cr Live Oak CAD
 cr Louisiana Safety Systems, Inc.
 intp Manta Ray Offshore Gathering Company, L.L.C.
 intp Nautilus Pipeline Company, L.L.C.
 cr Oceaneering International Inc.
 cr Oil States Energy Services, LLC
 cr Partco, LLC
 cr Philadelphia Indemnity Insurance Company
 cr R360 Environmental Solutions, LLC
 intp RLI Insurance Company
 cr Renaissance Offshore, LLC
 cr Republic Helicopters, Inc.
 cr Ridgewood Energy Corporation
 cr Rio Grande City CISD
 cr Samson Contour Energy E & P, LLC
 cr Samson Offshore Mapleleaf, LLC
 cr Sea Robin Pipeline Company, LLC
 cr Starr County
 cr State of Louisiana, Department of Natural Resource
 cr Stingray Pipeline Company, LLC
 intp Subsea 7 LLC
 cr The Hanover Insurance Company
 crcm The Official Committee of Unsecured Creditors
 cr Travelers Casualty and Surety Company of America
 cr Trunkline Gas Company, LLC
 cr U.S. Department of the Interior
 cr W&T Offshore, Inc.
 cr XL Specialty Insurance Co
 cr XTO Energy, Inc.

TOTALS: 52, * 0, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 17, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 15, 2020 at the address(es) listed below:
 NONE.

TOTAL: 0